

Privacy Notice – Closed Circuit Television and Webcams

Introduction

Highland and Islands Airports Limited (HIAL) is a Non-Departmental Public Body, wholly owned by the Scottish Ministers. As one of the country's leading regional airport operators, HIAL runs 11 airports across Scotland – at Barra, Benbecula, Campbeltown, Dundee, Islay, Inverness, Kirkwall, Stornoway, Sumburgh, Tiree and Wick John O'Groats. HIAL's airports are vital to the social and economic welfare of the communities they serve but are loss-making and supported by subsidies from the Scottish Government in accordance with Section 34 of the Civil Aviation Act 1982.

HIAL uses personal information for a range of purposes and our privacy notices provide information about why we obtain and collect personal information, and how we process it.

Under the General Data Protection Regulation (GDPR), HIAL is required to provide information about how personal information that we obtain is processed.

This privacy notice explains how HIAL uses images captured by:

1. Closed Circuit Television (CCTV)
2. Webcams

1. CCTV

Why are we collecting your information?

HIAL collects images using CCTV systems at most of our airport locations.

CCTV images are collected for a number of purposes including:

- i. Meeting statutory obligations laid down by aviation regulations and legislation;
- ii. Enabling the appropriate safety and operational management of airports;
- iii. Supporting general employment purposes, which may include employees of organisations contracted to supply services by HIAL;
- vi. Safeguarding the legitimate interests of the organisation and individuals whilst supporting management and training operations;
- vii. Providing evidence for audits (by both internal and external auditors, as well as regulators that have a legal right of access to information held by HIAL), and to assist with the investigation of security and safety related incidents.
- viii. Assisting with the prevention and detection of crime and other matters such as missing person enquiries.

How will my information be used?

HIAL has a legal obligation to operate CCTV in certain parts of some of its airports, which is laid down by the UK Single Consolidated Direction (Aviation) 2017 (SCD No. 1/2017). The Single Consolidated Direction sets out the more stringent measures to the common basic standard on civil aviation

security applicable to the UK, as permitted by Article 6 of Regulation (EC) No 300/2008. Many of the other functions and purposes have a basis in law and processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the controller.

Occasionally, processing will be carried out in the legitimate interests of the controller as described above, and processing may also be carried out where it can be justified using one or more of the exemptions under data protection law, in particular those relating to crime and taxation.

Will my information be passed to anyone else?

Staff responsible for the functions and purposes listed above will process the information collected by the CCTV system. This may include staff from external organisations (for example, regulators) where they carry out the purposes stated above.

HIAL uses a data processor to manage and maintain the CCTV systems. Data processing agreements are place with all organisations that process personal information on HIAL's behalf, which require processing to be carried out within the EEA, or for appropriate safeguards to be in place where it is carried out by an international organisation. Images and other information held by CCTV systems are not transferred internationally.

Other than described above, HIAL will never pass images to any other third party, unless there is a statutory requirement to do so or the processing is otherwise lawful, for example disclosure to law enforcement agencies for the purposes of crime, and taxation under exemptions at Schedule 1, Part 1, Paragraph 2, of the Data Protection Act 2018.

In instances of responding to data subject access requests for CCTV footage, HIAL uses software to apply a blurring process to protect the privacy of others, and other information which would infer identity of others, for example vehicle number plates.

What happens when my information is no longer required?

CCTV images are retained for 30 days, after which they are destroyed.

In exceptional circumstances, images may be retained for longer where they are used for certain purposes described above, for example where they are used as evidence in an investigation. In these cases, the images will be retained in accordance with HIAL's retention schedules.

2. Webcams

Why are we collecting your information?

HIAL's spectacular and unique location means that the organisation and its operations attract interest from around the world. To help promote and raise awareness of HIAL's services and role within the community we have installed a webcam at Barra airport. Webcams may be installed at other airports at some point in the future and will be added to this privacy notice as and when required.

HIAL collects a static image from the webcam at Barra once every 10 minutes between 0600 – 0000 each day. The frame of view has been specifically chosen to ensure that areas with a relatively high volume of people are excluded, such as the car park although it does include area in which people embark and disembark from planes. To minimise the personal data obtained and

processed, the quality of the image has been set to make sure that people cannot be directly identified from publicised images. It remains possible that, in conjunction with other information, where people are captured in the images it may occasionally be possible to identify them.

How will my information be used?

Each image taken by the camera will be posted on the HIAL website. As explained above, the amount of personal data contained in the images will be limited and it is extremely unlikely that a person will be identifiable in the images without using other information. Where a person can be identified, HIAL is processing this information based on their legitimate interests as well as those of the local communities. The webcam offers a unique promotional opportunity to raise the profile of the organisation and the services it offers, as well as the locations in which it operates.

Will my information be passed to anyone else?

HIAL uses a data processor to manage and maintain the HIAL website. Data processing agreements are place with all organisations that process personal information on HIAL's behalf, which require processing to be carried out within the EEA, or for appropriate safeguards to be in place where it is carried out by an international organisation. As far as we are able to establish, images are not transferred internationally by HIAL or data processors. They may be viewed outside of the EEA and the safeguards that have been implemented should ensure that the images do not constitute personal data. Where it may be possible to determine those in the image, the data collected has been minimised to safeguard their privacy.

What happens when my information is no longer required?

The images are stored on HIAL servers for 24 hours. Those that are displayed on the website are overwritten by the next image and not stored for future use by the website provider.

Additional Rights

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- i. request access to your personal information;
- ii. request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay;
- ii. request erasure of your personal information when certain conditions apply;
- iii. restrict processing under certain circumstances;
- iv. object to processing;
- v. data portability in some circumstances.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information.

Will My Information be Passed to Anyone Else?

There may be occasions when HIAL is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why HIAL is unable to comply with the request and any options available to you.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time, however, no personal information processed by CCTV systems or by the webcams is processed under this basis. You can find out how your

personal information is being lawfully processed under the section How will my information be used?

Contact Details

HIAL is the Data Controller (or Controller) images collected by the CCTV. If you have any queries relating to CCTV at a particular airport, please contact the information desk in the first instance.

If you have any queries regarding the information in this privacy notice, please contact the Data Protection Officer DPO@hial.co.uk

Complaints

Should you be unhappy with the way in which HIAL have processed your personal data, you have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk/>